

**ROBERT S. SOLA**

Oregon State Bar No. 84454  
rssola@msn.com  
Robert S. Sola, P.C.  
1500 S.W. First Ave., Suite 800  
Portland, Oregon 97201  
Telephone (503) 295-6880  
Facsimile (503) 243-4546

**JAMES A. FRANCIS** (*pro hac vice*)

jfrancis@consumerlawfirm.com

**JOHN SOUMILAS** (*pro hac vice*)

jsoumilas@consumerlawfirm.com

**LAUREN KW BRENNAN** (*pro hac vice*)

lbrennan@consumerlawfirm.com

Francis Mailman Soumilas, P.C.

1600 Market Street, Suite 2510

Philadelphia, PA 19103

Telephone: (215) 735-8600

Facsimile (215) 940-8000

*Attorneys for Plaintiff Bonnie Magallon  
and the certified class*

IN THE UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

**BONNIE MAGALLON,**  
**On behalf of herself and all others similarly**  
**situated,**

Plaintiff,

v.

**ROBERT HALF INTERNATIONAL, INC.,**  
a foreign corporation,

Defendant.

---

Civil No. 6:13-cv-01478-SI .

**DECLARATION OF JOHN  
SOUMILAS IN SUPPORT OF  
PLAINTIFF'S MOTION TO  
EXCLUDE PORTIONS OF  
THE REPORT AND  
TESTIMONY OF REBECCA  
KUEHN**

**DECLARATION OF JOHN SOUMILAS IN SUPPORT OF PLAINTIFF'S MOTION  
TO EXCLUDE PORTIONS OF THE EXPERT REPORT AND TESTIMONY  
OF REBECCA KUEHN**

I, John Soumilas, hereby declare as follows:

1. I am an attorney duly licensed to practice in the Commonwealth of Pennsylvania and the State of New Jersey.

2. I am one of the counsel of record for Plaintiff Bonnie Magallon and the class, after being admitted to practice *pro hac vice* by this Court on April 25, 2014 (ECF 15), and have personal knowledge of the facts and circumstances of this matter.

3. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Rebecca E. Kuehn produced in this matter, dated January 5, 2024.

4. Attached hereto as Exhibit B is a true and correct copy of the transcript of the deposition of Rebecca E. Kuehn, taken on February 28, 2024.

5. Attached hereto as Exhibit C is a true and correct copy of Defendant Robert Half International, Inc.'s Responses to Plaintiff Bonnie Magallon's Interrogatories, dated May 1, 2014.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 1, 2024

/s/ John Soumilas  
John Soumilas